

STATE OF ILLINOIS

ILLINOIS COMMERCE COMMISSION

Illinois Power Company)	
d/b/a AmerenIP)	
and Ameren Illinois Transmission Company)	
)	
Petition for a Certificate of Public Convenience)	
and Necessity, pursuant to Section 8-406 of the)	
Illinois Public Utilities Act, to construct,)	
operate and maintain new 138,000 volt electric)	06-0706
lines in LaSalle County, Illinois.)	

**PETITION TO DELAY DECISION ON SUGGESTION THAT THE
COMMISSION RE OPEN ON ITS OWN MOTION**

NOW COMES Fred M. Morelli, Jr., on behalf of Skydive Chicago, Inc. (herein after referred to “Skydive”), Ottawa Airport, Inc., (herein after referred to as “the Airport”), and individuals known as Fox River Alliance, (hereinafter referred to as “FRA”), and Friends of the Fox River, (herein after referred to as “Friends”), and respectfully requests that the Illinois Commerce Commission delay decision on his previously filed Suggestion that the Commission Re-Open on its Own Motion and Addendum thereto. In support of the request he states as follows:

1. He reasserts all matters set forth in his previously filed Suggestion that the Illinois Commerce Commission Re Open on it’s own Motion and Addendum thereto as though fully set forth herein.
2. Members of the Fox River Alliance have been in contact with the Illinois Department of Natural Resources regarding the existence of eagles’ nests along the Fox River in the area scheduled for clear cutting.

3. The location of those eagles' nests are in the process of being pinpointed by Global Positioning System (G.P.S).

4. We have been advised by a spokesperson of the Illinois Department of Natural Resources that they will verify the existence of the eagles' nests.

5. The clear cutting of a tree in which an eagles' nest is located is a violation of Federal Law. (16 U.S.C. 668a-d) commonly known as the Bald and Golden Eagle Protection Act.

6. The verification of the existence of eagles' nests will constitute new evidence for the Illinois Commerce Commission to consider and an additional reason for the Illinois Commerce Commission to Re Open on its Own Motion.

WHEREFORE, Fred Morelli, Jr., on behalf of the previously enumerated clients, respectfully requests the Illinois Commerce Commission delay decision on his previously filed Suggestion to that the Illinois Commerce Commission Re Open on its own Motion and Addendum thereto until such a time the Illinois Department of Natural Resources verifies the existence of the eagles' nests, which could take as long as six (6) weeks.

Fred M. Morelli, Jr.

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